

THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF NEW YORK

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NORDSENSE, INC.,

Plaintiff,

-against-

ULTRALIFE CORPORATION,

Defendant.

Case No. 6:24-cv-06659-MAV

**MEMORANDUM OF LAW IN
SUPPORT OF NORDSENSE’S
MOTION FOR WAIVER OF LOCAL
COUNSEL REQUIREMENT UNDER
LOCAL RULE 83.2**

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Plaintiff Nordsense, Inc. (“Nordsense”), through its undersigned attorney, respectfully submits this Memorandum of Law in Support of its Motion for Waiver of the Local Counsel Requirement under Local Rule 83.2(a) of the Local Rules of Civil Procedure for the United States District Court for the Western District of New York. In support of Nordsense’s Motion, the undersigned counsel states as follows:

On November 14, 2024, Nordsense filed its Complaint against Defendant Ultralife Corporation (“Ultralife”). ECF No. 1. Nordsense has retained Ian Shapiro from the law firm of Cooley LLP to prosecute this action. Mr. Shapiro is admitted to practice law in the State of New York and is a member in good standing of the bar of this Court. Pursuant to Local Rule 83.1, Mr. Shapiro may practice before this Court without local counsel. The Court and opposing counsel can readily meet and communicate with Mr. Shapiro and Cooley LLP regarding this matter.

William V. O’Connor is an attorney at Cooley LLP licensed in California and is fully knowledgeable of the facts of this case. On February 3, 2025, Nordsense filed a *pro hac vice* application for Mr. O’Connor. ECF No. 12. As stated in his *pro hac vice* petition, Mr. O’Connor

has the requisite moral character and fitness to practice before the Court. Because counsel's office is not located within the Western District of New York, Nordsense respectfully requests that this Court grant permission to proceed without local counsel pursuant to Local Rule 83.2(a).

Accordingly, the undersigned respectfully requests that the Court grant a waiver of the local counsel requirement as set forth in Local Rule of Civil Procedure 83.2(a)(1).

Dated: February 4, 2025

COOLEY LLP

By: *s/ Ian Shapiro*

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